

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

GAIL CORVELLO, et al.,)	
Plaintiffs,)	C.A. No. 05-0221S
)	(Related Case Nos.: 05-522S,
v.)	05-274S, 05-370S)
SOUTHERN UNION COMPANY and)	
NEW ENGLAND GAS COMPANY,)	
Defendants and)	
Third-Party Plaintiffs,)	
)	
v.)	
BRIDGESTONE AMERICAS TIRE)	
OPERATIONS, LLC and)	
HONEYWELL INTERNATIONAL INC.,)	
Third-Party Defendants.)	

JOINT MOTION TO AMEND PRETRIAL ORDER

Pursuant to Fed. R.Civ.P. 26 and LR Cv 26, Third Party Plaintiffs Southern Union Company and New England Gas Company and Third-Party Defendants Bridgestone Americas Tire Operations, LLC and Honeywell International Inc. jointly request that the Court amend its Pretrial Order entered on January 9, 2012, by amending the dates contained therein as follows:

1. All factual discovery closed by: 06/01/2012
2. All expert discovery closed by: 10/12/2012
3. Dispositive motions filed by: 11/16/2012
4. Third-Party Plaintiff expert witness disclosures: 07/13/2012
5. Third-Party Defendants expert witness disclosures: 08/13/2012
6. Pretrial Memoranda, if no dispositive motions: 11/16/2012
(or 30 days after decision on dispositive motions)

In support of this joint motion, the parties state that they have been diligently continuing discovery, but that additional discovery remains to be completed (including at least three out-of-town depositions and two 30(b)(6) depositions). The parties believe that the 60-day extension of

dates sought herein will result in the orderly completion of factual and expert discovery and preparation and filing of dispositive motions, as well as pretrial memoranda. The parties respectfully request that the Court amend the Pretrial Order, as detailed above, by extending the dates for fact discovery and all events that follow the completion of fact discovery as set forth above.

**SOUTHERN UNION COMPANY
NEW ENGLAND GAS COMPANY**

By its Attorneys,

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Dated: February 28, 2012

CERTIFICATE OF SERVICE

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I hereby certify that I electronically filed the within Joint Motion To Amend Pretrial Order on February 28, 2012, and that this document is available for viewing and downloading from the Court's Electronic Case Filing System. Service on all counsel of record will be effectuated by electronic means and by mailing first class mail, postage prepaid, to non-registered parties and persons.

/s/ Kimberly A. Simpson _____